



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 08, 2016

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MS. KATHIE TRYSON
WILLERT HOME PRODUCTS, INC.
4044 PARK AVENUE
ST. LOUIS, MO 63110

Dear Ms. Tryson:

Subject: Transfer of Pesticide Registrations and Data From Company Number 81433 to Company Number 1475

Pursuant to your request in your letter and transfer agreement of November 24, 2015, we have approved the transfer of the following registrations from **IMS TRADING, LLC**, company number **81433** to **WILLERT HOME PRODUCTS, INC.**, company number **1475**.

The effective date of these changes is the date of this letter.

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
IMS ORIGINAL MOTH BALLS	81433-6	1475-163

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form

"Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated November 24, 2015 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **WILLERT HOME PRODUCTS, INC.** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MS. RUBI MORALES
IMS TRADING, LLC
13200 ESTRELLA AVENUE, UNIT B
GARDENA, CA 90248

RE: L_81433_RAD_1475_02_08_2016

APPENDIX A

Reference: 40 CFR § 152.98 (a) (3)

For Exclusive Use See: 7 USC § 136 et seq., (FIFRA) Sec. 3 (c) (1) (F) and 40 CFR §152.83(c)

MRID or Other Identifying Administrative Number	Name of the Study	Name of Person or Lab That Conducted the Study	Date the Study Was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes Then, Date Period of Exclusive Use Ends
46778300	Submission of Product Chemistry Data in Support of the Application for Registration of IMS Old Fashion Moth Balls. Transmittal of 1 Study.	The Acta Group, LLC	03/06/2006	No	
46778301	Groups A & B -- Product Chemistry: Naphthalene. Project Number: 983/002/02.	The Acta Group, LLC	03/06/2006	No	
48977700	Submission of Product Chemistry Data in Support of the Registration Review of the Naphthalene Containing Product IMS Original Moth Balls. Transmittal of 1 Study.	The Acta Group, LLC	10/19/2012	No	
48977701	UV-Visible Spectrum: Naphthalene. Project Number: 983/002/03.	The Acta Group, LLC	10/19/2012	No	
49116500	Submission of Product Chemistry Data in support of the Registration Review of the Naphthalene Containing Product IMS Original Moth Balls. Transmittal of 1 Study.	The Acta Group, LLC	05/02/2013	No	
49116501	Groups B -- Product Chemistry - Physical/Chemical Properties (IMS Original Moth Balls). Project Number: 983/002/04.	The Acta Group, LLC	05/02/13	No	